

Hazardous Waste Inspection Report Generators – Part A

Date of inspection 3-20-90 Time start _____ Time finish _____
Name of inspector Gerald Murphy
Company installation name Braeburn Alloy Steel, Div of CCX, Inc.
Location Main Road
County Westmoreland Municipality Lower Burrell
Identification number PA0004337903
Name of responsible official Robert Lambermont
Title Mgr of Maintenance & Engineering
Mailing address River Road & Main Road Lower Burrell
Area code and telephone number (412) 224-6800 Pa 15068
Name of person interviewed _____
Title _____
Mailing address (if different from above) SAME
Area code and telephone number _____

1. Current waste handling method:

NA.

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

SQZ

- a. none presently. kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number

Destination Facility

Location and Type

[illegible]

Hazardous Waste Inspection Report
Generators - Part B*Brachum Alloy Steel**3-20-90*

1—No Violation Observed

2—Not Applicable

3—Not Determined

4—Non-Compliance

Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.262
<input checked="" type="checkbox"/>				Hazardous waste determination, copies available	(b)
<input checked="" type="checkbox"/>				Identification number	(c)(1)
<input checked="" type="checkbox"/>				Hazardous waste shipments offered only to licensed transporters	(c)(4)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Authorization received from TSD facility for wastes shipped off-site	(d)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			PA manifest used for intrastate shipments	(e)(2)
<input checked="" type="checkbox"/>				Disposer state manifest or EPA format manifest used for out-of-state shipments	(e)(3)
<input checked="" type="checkbox"/>				Manifests filled out properly and completely	(e)(7)
<input checked="" type="checkbox"/>				Manifests routed properly and within time limits (7 days)	(e)(14) or (15)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Proper U.S. DOT shipping containers or packages	(f)(1)(i)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Placards offered to transporter	(f)(2)
<input checked="" type="checkbox"/>				Wastes accumulated on-site for less than 90 days	(g)(1)(i)
<input checked="" type="checkbox"/>				Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Containers managed in accordance with 75.265(q)(1)— <i>14</i>	(g)(1)(iii)
<input checked="" type="checkbox"/>				Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
<input checked="" type="checkbox"/>				Records retained at designated location for 20 years	(h)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Quarterly reports submitted to the Department	(i)
<input checked="" type="checkbox"/>				Exception reporting procedures followed	(j)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Hazardous waste disposal plan, if required	(l)
<input checked="" type="checkbox"/>				Spill reporting procedures followed	(m)(1)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Preparedness, Prevention and Contingency Plan and implemented	(m)(5)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Special requirements followed for international shipments	(o)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			Drum accumulation area inspected weekly as per 75.265(q)(5)	(g)(1)(iii)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 3-20-90 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell

A) Observations:

- 1) A file review was conducted on this date to determine compliance with Class II violations cited on 12-14-89.
- 2) Since the past inspection a letter dated 1-22-90 was received with attached correspondence and photo copy of manifest which has the ~~TSO~~ signature.
- 3) A letter dated 2-9-90 and attached correspondence and manifest photocopy verifies a correction to the manifest which did not have the proper U.S. EPA ID No.
- 4) An EPA Notification of Hazardous Waste Activity form - revised notification - now identifies this facility as a Small Quantity Generator as of 12-28-89 - received 1-17-90.
- 5) The above 2-9-90 letter also verifies that the small quantity of used gasoline was reused on site in their yard crane. This had been previously used to clean motor oil off of filters.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 3-20-90

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 3-20-90 Identification Number PAD004337903
Company, Installation Name Brachman Alloy Steel
County Westmoreland Municipality Lower Merion

B) Comments:

1) In summary this previous Hazardous Waste Generator presently does not have any hazardous waste, is reclassified as a SQG, and has corrected all outstanding violations.

2) NO LDR violations had previously been noted.

3) This facility file is hereby closed.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Gerald MyskoDate 3-20-90Inspector (signature) Gerald MyskoDate 3-20-90

BRAEBURN

ALLOY STEEL

Lower Burrell, PA 15068 412/224-6900

February 9, 1990

Mr. Gerald Tripoli
PA. Dept. of Environmental Resources
Bureau of Waste Management
Armbrust Professional Center
R. D. #2, Box 603-C
Greensburg, PA 15601

RECEIVED
FEB 14 1990

W.R.

Dear Mr. Tripoli:

Enclosed is a copy of the corrected Michigan Manifest with our correct PAD number. I have also sent you a copy of the letter from Petro-Clean requesting the change.

In regards to the can of gasoline you saw in our shed. We filtered the gasoline and poured it into our yard crane for fuel. Therefore, the gasoline can has been disposed of per your instructions.

Very Truly Yours,

BRAEBURN ALLOY STEEL



Robert A. Lambermont
Mgr., Engineering & Maintenance

RAL:amm
Enc.

BRAEBURN

Division of CCX, Inc.

PETROCLEAN

SERVING THE PETROLEUM AND CHEMICAL INDUSTRIES

24 HOUR SERVICE
412 279-9556

PO BOX 92
CARNEGIE, PENNA. 15106

February 2, 1990

Mrs. Jean Lecker
Michigan DNR
PO Box 30241
Lansing, MI 48909

Dear Mrs. Lecker:

This letter is in response to our telephone conversation of 2/2/90. It concerns the shipment of waste on manifest #MI 1818748. The generator's US EPA ID No. was incorrect on the manifest. I have contacted the TSDF, as well as the generator, and they have made the corrections on their copies of the manifest. The transporter copy which I have enclosed, also shows the corrected number. Please make the corrections on your copy. Thank you for your help. Contact me at (412) 279-9556 if you require additional information.

Sincerely,



Chris Truby
Waste Compliance Coordinator

CORRECT EPA ID NO.: PAD004337903

DNR
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

1979 as amended and reauthorized by Act 136 PA 1969
Failure to file is punishable under section 299 548 MCL or Section 10 of Act 136 PA 1969

Please print or type

Form Approved OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PAID0004337903112129		2. Page 1 of 1		3. Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Braeburn Alloy Steel River Road Lower Burrell, PA 15068				A. State Manifest Document Number MI 1818748			
4. Generator's Phone (412) 224-6900				B. State Generator's ID			
5. Transporter 1 Company Name Petroclean, Inc.		6. US EPA ID Number PAID0098431885		C. State Transporter's ID		D. Transporter's Phone (412) 279-9556	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address Michigan Disposal, Inc. 49350 N. I-94 Service Drive Dearborn, MI 48128		10. US EPA ID Number MID0000724831		G. State Facility's ID		H. Facility's Phone (313) 699-7120	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM				12. Containers No. Type		13. Total Quantity	
a. <input checked="" type="checkbox"/> Hazardous Waste Solid, H.O.S. ORM-E, NA 9189, RQ(1/0.454)				010 DM		6000 P	
b.							
c.							
d.							
14. Additional Descriptions for Materials Listed Above Material in Section 8 11a. 1st: Bag house dust from electrical arc furnace				K. Handling Codes for Wastes Listed Above		a/ / b/ / c/ / d/ /	
15. Special Handling Instructions and Additional Information Acceptance Code: 112989-ME							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name BRAEBURN ALLOY STEEL				Signature A.M. STEIN		Date 11/1/89	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature Sean Porter		Date 11/21/89	
Printed/Typed Name SEAN PORTER				Signature		Date	
18. Transporter 2 Acknowledgement or Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space 71776							
20. Facility Owner or Operator. Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name VINIE MINNIS				Signature The Minnis		Date 12/4/89	

BRAEBURN

ALLOY STEEL Lower Burrell, PA 15068 412/224-6900

January 22, 1990

RECEIVED
JAN 23 1990
GBG - D.E.R.

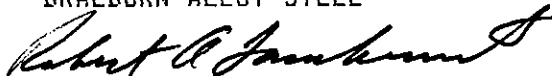
Mr. Geraald Tripoli
Penna. Dept. of Environmental Resources
Bureau of Waste Management
Armbrust Professional Center
R. D. 2, Box 603-C
Greensburg, Pa. 15601

Dear Sir,:

Enclosed please find a signed copy of Manifest CWMA 333249 returned to me from Emelle, Alabama by my request. See attached letter of request and their reply.

Very Truly Yours,

BRAEBURN ALLOY STEEL



Robert A. Lambermont
Mgr. Engineering & Maintenance

RAL/r1

Enclosure



Chemical Waste Management, Inc.
Emelle Facility
P.O. Box 55
Emelle, Alabama 35459
205/652-9721

January 17, 1990

Braeburn Alloy Steel Division
River Road
Lower Burrell, PA 15068

Attn: Mr. Robert A. Lambermont

Dear Mr. Lambermont,

I am sending a copy of manifest number CWMA 333249 that you requested on January 10, 1990.

Yours truly,

A handwritten signature in cursive script that reads 'Glory McAbey / RT'. The signature is written in dark ink and is positioned above the printed name and title.

Glory McAbey
Document Control Supervisor

rt

BRAEBURN

ALLOY STEEL Lower Burrell, PA 15068 412/224-6900

January 10, 1990

Chemical Waste Management Co.
Alabama Highway 17
Emelle, Alabama, 35459

Attn: Ms. Glory McAboy

Dear Ms. McAboy,

Per our phone conversation of December 21, 1989 I'm requesting a copy of manifest number CWMA 333249 delivered to you on or about June 6, 1987.

Our original generator signed copy was either not returned to us or we misplaced it here at Braeburn.

I need a copy for Pa. DER records and for our records.

Please send to: Braeburn Alloy Steel Div.
River Road
Lower Burrell, Pa. 15068

Attn: Mr. Robert A. Lambermont
Mgr. Eng. & Maint.

Thank you for your co-operation.

Yours truly



Robert A. Lambermont
Mgr. Eng. & Maint

c/c; A.J. Lelik
File.

Trailer:

9017



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Trailer No.: 4

Page 4 of 1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. P A D 0 0 4 3 3 7 9 0 3 6 2 2 3 7	Manifest Document No. 2	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Braeburn Alloy Steel Division of CCX, Inc. Lower Burrell, PA 15068		Kyle W. Freiberg Supervisor-Metallurgical Testing/Inspection		A. State Manifest Document Number CWMA 333249		
4. Generator's Phone (412) 224-6900		6. US EPA ID Number P A D 0 6 5 6 3 6 3 4 2		B. State Generator's ID PA0004337903		
5. Transporter 1 Company Name Ecology Chemical & Refining Company Manor, PA 15665		8. US EPA ID Number		C. State Transporter's ID PAZ AH0039		
7. Transporter 2 Company Name		10. US EPA ID Number		D. Transporter's Phone (412) 864-5237		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		12. Containers No. Type 0103 DIF 011500		E. State Facility's ID		
		13. Total Quantity		F. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		14. Unit Wt/Vol		Waste No.		
a. Waste Hydrochloric Acid Solution/Corrosive Material - UN1789 (D002) - (waste water, hydrochloric acid, earth, iron and mineral oil) CWM Profile Number COL-D-49940		P		D002 D007		
CWM Profile Number						
CWM Profile Number						
CWM Profile Number						
J. Additional Descriptions for Materials Listed Above 3 ea. DOT Plastic 55 gallon Drums (1 to 50% Solids)		K. Handling Codes for Wastes Listed Above D-B1				
15. Special Handling Instructions and Additional Information Please send Generator No. 2 Copy to: Generator address given above — Attention: Mr. Kyle W. Freiberg Supervisor-Metallurgical Testing/Inspection In case of an emergency, or any problems with this shipment, please contact Daniel R. Haber, Ecology Chemical & Refining Co. (412) 864-5237.						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Kyle W. Freiberg		Signature Kyle W. Freiberg		Month Day Year 10/22/58		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Michael J. Minnich		Signature Michael J. Minnich		Month Day Year 10/22/58		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indicate 1 Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Mike Harris						
Signature Mike Harris		Month Day Year 03/02/58				

GENERATOR

TRANSPORTER

FACILITY

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

United States Environmental Protection Agency
Washington, DC 20460

Notification of Hazardous Waste Activity

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

RECEIVED
JAN 17 1988
OGB-D.E.R.

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)C
FT/A C
1

I. Name of Installation

BRAEBURN ALLOY STEEL DIV.

II. Installation Mailing Address

Street or P.O. Box

C
3

RIVER ROAD

City or Town

State

ZIP Code

C
4

LOWER BURRELL

PA 15068

III. Location of Installation

Street or Route Number

C
5

SAME AS ABOVE

City or Town

State

ZIP Code

C
6

SAME AS ABOVE

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2

LAMBERTSON ROBERT

412 224 6900

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R

CCX INC.

CORPORATE

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

- ☒ 1a. Generator ☒ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On site Burner) Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

- ☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- ☐ A. First Notification ☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

PAD 004337903

ID — For Official Use Only																	
C																T/A	C
W																	1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable (D001)
 ☐ 2. Corrosive (D002)
 ☐ 3. Reactive (D003)
 ☐ 4. Toxic (D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>Robert A. Lambermont</i>	Name and Official Title (type or print) ROBERT A. LAMBERMONT MGR: ENG & MAINT.	Date Signed 12/28/89
--	--	-------------------------

Hazardous Waste Inspection Report Generators — Part A

Date of inspection 12-14-89 Time start 11:20 Time finish 4:00 PM

Name of inspector Gerald Trisoli

Company, installation name Braeburn Alloy Steel Div. of CCX, Inc.

Location Main Road

County Westinghouse Municipality Lower Burrell

Identification number SPAD 004 337903

Name of responsible official Robert Lambermont

Title Mgr. of Maintenance & Engineering

Mailing address River Road & Main Road Lower Bunell P. 15068

Area code and telephone number (412) 224-6900

Name of person interviewed Bob Lambermont.

Title Same.

Mailing address (if different from above) Same

Area code and telephone number _____

1. Current waste handling method:

- a. ~~On-site~~ ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. 2727 kg./yr. (cleanup only)

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

[illegible]

Hazardous Waste Inspection Report
Generators — Part B

12-14-89

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
	✓			Authorization received from TSD facility for wastes shipped off-site		(d)
	✓			PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
			✓	Manifests filled out properly and completely		(e)(7)
✓				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
✓				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
✓				Placards offered to transporter		(f)(2)
✓				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
			✓	Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			✓	Containers managed in accordance with 75.265(q)(1)— 14		(g)(1)(iii)
✓				Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
✓				Records retained at designated location for 20 years		(h)
✓				Quarterly reports submitted to the Department		(i)
✓				Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
✓				Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
		✓		Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
TSD Facilities Storage (Containers)

12-14-89

1—No Violation Observed					2—Not Applicable	3—Not Determined	4—Non-Compliance
Status					REQUIREMENT		Chapter Citation
1	2	3	4				75.265
✓					Containers managed to prevent leaks and spills.		(q)(1), (4)
✓					Containers are compatible with waste stored.		(q)(2)
✓					Containers are closed during storage.		(q)(3)
			✓		Container storage area inspected weekly for leaks, deterioration, etc.		(q)(5)
✓					Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.		(q)(6)
✓					Satisfactory procedures followed for handling incompatible wastes.		(q)(7), (8)
✓					Incompatible wastes separated or protected from other materials.		(q)(9)
			✓		Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.		(q)(10)
			✓		Containment system has impervious base free of cracks.		(q)(10)(i)
			✓		Efficient drainage provided from base to sump or collection system.		(q)(10)(ii)
			✓		Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.		(q)(10)(iii)
✓					Run-on into containment system prevented.		(q)(11)
			✓		Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.		(q)(12)
✓					At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.		(q)(13)
	✓				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤ 6 feet high, 8 ft x 8 ft., 5-foot surrounding aisle space).		(q)(14)(i)
✓					Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤ 9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).		(q)(14)(ii)
✓					Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.		(q)(14)(ii)
✓					Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria (≤ 9 feet high).		(q)(14)(iii)
✓					Containers labeled to accurately identify hazardous waste contained.		Act 97 Section 403(b)(2)

Hazardous Waste Inspection Report
 Comments - Part C

Date of Inspection 12-14-89 Identification Number PAD 004 337 903
 Company, Installation Name Braeborn Alloy Steel
 County Westmoreland Municipality Lower Burrell

A) Observations:

- 1) Baghouse was cleaned up by Petroclean.
- 2) A shipment of K061 was made by Petroclean to Michigan Disposal, Inc. on 12-11-89.
- 3) The generators EPA ID No. was incorrectly typed on the manifest.
- 4) Michigan Disposal was notified as of this date.
- 5) An attached sheet notifies that this waste is LDR waste.
- 6) A TCLP analysis for K061 has been completed and indicate that the untreated non-wastewater (low zinc) slightly exceeds the treatability standards.
- 7) A separate letter dated 12-4-89 acknowledges acceptability of this one time shipment of 10 drums for treatment at their Belleville Michigan facility of Michigan Disposal, Inc.
- 8) The electric arc furnace and baghouse have now been eliminated from use.

(cont.)

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Person Interviewed (signature)

Robert G. [Signature]

Date

12/14/89

Inspector (signature)

Gerald Tricoli

Date

12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PA0004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell.

Observations (cont.)

- 9) One 2-25-87 manifest to Enille, Alabama (CWM) # CWMA 333249 still lacks a signed copy.
- 10) CWM was contacted by phone and requires a written request to find & photocopy the appropriate manifest (signed).
- 11) All of the violations listed on my 7-14-88 N.O.V. letter were reviewed and complied with as follows:
 - a) K061 dust (10 drums) stored over 90 days, was removed 12-11-89
 - b) K061 dust was properly containerized, labeled & dated by Petroclean prior to 12-11-89.
 - c) The four unsigned manifest copies have been located and/or photocopied and now are being stored.
 - d) Five quarter reports of hazardous waste activities were received by mail on 9-15-89.
- 12) A small quantity of the waste gasoline solvent remains in one drum.

(cont.)
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Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Gerald Myron

Date

12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell

Observations (cont.)

- 13) This drum has not been labeled with a U.S. D.O.T. "Flammable Liquid" label.
- 14) Gasoline is no longer used as a degreaser. Safety Kleen is being considered as an alternative.
- 15) All of the drums previously noted containing waste oils around the plant have been pumped to a holding tank, tested and hauled by Liquix as a waste oil.
- 16) An extensive number of drums (400-500) have been cleaned up from around the plant.
- 17) The depressed area adjacent to the plant is being regraded. Nearly all of the refractories and clean fill have been covered with soil. A fence is being installed along the far property line near the Village of Braeburn.
- 18) Drums remain to be cleaned out from the far property downstream of the plant in the Spring.

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Person Interviewed (signature) _____

Date _____

Inspector (signature) Gerald MyziorDate 12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell

B) Violations:

- 1) The 12-11-89 manifest was not properly completed. The U.S. EPA. I.D. No. was not reported correctly. You should contact the TSD facility and advise them that the proper number should be noted on the manifest discrepancy area. You should check each manifest more carefully before shipping.
- 2) One drum containing an ignitable waste lacks a U.S. DOT. "Flammable Liquid" label. You should secure the required label on this drum.
- 3) The Area where this one drum of spent gasoline degreaser is stored does not meet the hazardous waste container storage requirements for a generator. As a generator, you are required to provide containment in accordance with 88 Pa.C.S. 265 (g)(10-12).

(cont.)

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Person Interviewed (signature) _____

Date _____

Inspector (signature) Gerald PyszolDate 12-14-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 12-14-89 Identification Number PADO04337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Merion

C) Comments:

- 1) This facility presently generated no hazardous waste and stores approximately 5-10 gals of a D001 waste in one drum. This facility presently appears to meet the EPA criteria of a small quantity generator and presently has well under 1000 Kg of hazardous waste on site.
- 2) No Landfill Disposal Restriction violations were evident. The "Observations" identify that proper notice has been made for the one shipment of H61.
- 3) The small quantity of D001 awaits ~~disposal~~ approval for disposal or reuse.

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Person Interviewed (signature)

Robert A. Gambino

Date

12/14/89

Inspector (signature)

Gerald Myers

Date

12-14-89

Hazardous Waste Inspection Report Generators — Part A

Date of inspection 9-8-89 Time start 11:30 Time finish 3:30
Name of inspector Gerald Tripoli Division _____
Company, installation name Brachum Alloy Steel Sub of CCX, Inc.
Location Main Road
County Westmoreland Municipality Lower Burrell
Identification number PA0004337903
Name of responsible official Robert Lambermont
Title Manager of Maintenance & Engineering
Mailing address River Road & Main Road Lower Burrell Pa
Area code and telephone number (412) 224-6900 15068
Name of person interviewed Bob Lambermont
Title Same
Mailing address (if different from above) SKARD
Area code and telephone number _____

1. Current waste handling method:

- a. ☒ On-site ☐ treatment, ☒ storage, ☐ disposal ☐ PBR
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
- d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 1 load KO61 dust remains kg./mo.
- b. _____ kg./yr.

last EAF melt
8-7-87

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

[illegible]

Hazardous Waste Inspection Report
Generators — Part B

9-8-89

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
✓				Authorization received from TSD facility for wastes shipped off-site		(d)
✓				PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
✓				Manifests filled out properly and completely		(e)(7)
		✓		Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
✓				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓				Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
✓				Placards offered to transporter		(f)(2)
			✓	Wastes accumulated on-site for less than 90 days		(g)(1)(i)
			✓	Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
			✓	Containers managed in accordance with 75.265(q)(1)— 14		(g)(1)(iii)
			✓	Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
			✓	Records retained at designated location for 20 years		(h)
			✓	Quarterly reports submitted to the Department		(i)
			✓	Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
✓				Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
TSD Facilities — Storage (Containers)*Brauburn Alloy Steel**9-8-89*

1—No Violation Observed				2—Not Applicable				3—Not Determined				4—Non-Compliance			
Status				REQUIREMENT								Chapter Citation			
1	2	3	4									75.265			
				Containers managed to prevent leaks and spills.								(q)(1), (4)			
✓				Containers are compatible with waste stored.								(q)(2)			
				Containers are closed during storage.								(q)(3)			
				Container storage area inspected weekly for leaks, deterioration, etc.								(q)(5)			
				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.								(q)(6)			
✓				Satisfactory procedures followed for handling incompatible wastes.								(q)(7), (8)			
✓				Incompatible wastes separated or protected from other materials.								(q)(9)			
			✓	Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.								(q)(10)			
			✓	Containment system has impervious base free of cracks.								(q)(10)(i)			
			✓	Efficient drainage provided from base to sump or collection system.								(q)(10)(ii)			
			✓	Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.								(q)(10)(iii)			
✓				Run-on into containment system prevented.								(q)(11)			
				Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.								(q)(12)			
			✓	At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.								(q)(13)			
✓				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤ 6 feet high, 8 ft x 8 ft., 5-foot surrounding aisle space).								(q)(14)(i)			
✓				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤ 9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).								(q)(14)(ii)			
✓				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.								(q)(14)(ii)			
✓				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria (≤ 9 feet high).								(q)(14)(iii)			
				Containers labeled to accurately identify hazardous waste contained.								Act 97 Section 403(b)(2)			

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-8-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel - Division of CCX, Inc.
County Westmoreland Municipality Lower Burrell City

A) Observations:

- 1) Weather on this date was previously raining, but was warm and cloudy during the inspection.
- 2) A review of the previous records indicate that no shipments of K061 dust have been made since 12-10-87.
- 3) Approximately one yard of K061 dust remain in a hopper and the baghouse, which is scheduled for dismantling.
- 4) The operator was not certain whether his dust was high or low zinc.
- 5) The dust hopper is in a closed shed, but does not constitute a D.O.T. approved shipping container. It is not marked or dated. No containment or collection systems are present.
- 6) Gasoline is used to clean oil filters out of equipment. Waste gasoline is stored in a 55 gal. unmarked drum.
- 7) The plant is presently being modified to increase the press, grinding and turning.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Gerald Nye

Date

9-8-89

Inspection Report Comments

Date of Inspection

9-8-89

Identification Number

PAP004332803

Company/Facility/Site Name

Braburn Alloy Steel.

Observations (cont.)

- 7) (cont.) capacities of the plant. The electric are furnace has been removed. Slag and old brick will be removed to make way for new floors for equipment + storage.
- 8) Waste oil & sludge from the pit of the hydraulic press ^{and elsewhere} has been cleaned up and dumped in ≈ 45 drums. The oil is overflowing from some of these drums on the ground.
- 9) 15 drums contain oil & scale.
- 10) 14 drums of spent calcium carbide were found in open top 55 gal drums. This would be a residual waste.
- 11) The oily scale & grindings and turnings ~~if~~ if not reclaimed would be a residual waste.
- 12) Four drums of pelletized calcium carbide are presently usable material. This is a potentially hazardous material capable of generating a flammable gas (acetylene) upon contact with water. One drum was open. (Cont.)

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Inspector (signature)

Gerald Nyxoli

Date

Date

9-8-89

Inspection Report Comments

Date of Inspection

9-8-89

Identification Number

PAD004337203

Company/Facility/Site Name

Breaarum Alloy Steel

Observations (cont)

- 13) The rolling mill was in operation today. Special shapes are being formed.
- 14) Both bio degradable & non bio degradable soluble oil coolants are used in the grinders, saws, planers, and lathes.
- 15) Moly disulphite is used on the roller mill.
- 16) Wet grinding produces ~ 12 drums/year of waste.
- 17) A 4000 gal hydraulic oil tank and a 3000 gal waste oil tank are both contained in a diked area.
- 18) An adjacent unpermitted residual waste landfill operation is nearly completed. [When the last of the buck and slabs are removed, no further fill should be dumped here unless it is clean fill. No residual wastes or unused chemicals should be dumped there.]

B) Violation

- 1) Baghouse dust from the EAF (K061) has been (cont.)

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were observed during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification may be forthcoming, confirming any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Inspector (signature)

Gerald M. M. M.

Date

Date

9-8-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-8-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell City

Violations (cont.)

- 1) (cont) stored since 8-7-87 in a hopper beneath the baghouse in excess of 90 days. All hazardous waste, including the dust inside the baghouse, should be cleaned up and properly removed within 90 days of the accumulation date. This is a violation of Section 75.262(g)(1)(i)(2).
- 2) The EAF dust (K062) has been stored in the dust collection hopper in a wooden shed. The container was not properly identified as a hazardous waste. The dust was not removed from the baghouse & ground at closure. This area has not been inspected weekly to verify that the containers were properly stored. This is a violation of Section 75.262(g)(1)(ii), (iv) and Section 75.265(g)(3)(5).
- 3) Effective December 10, 1988, the Pa. regulations required that all generators of hazardous waste comply with all of Section 75.265(g) including subsections (g)(10-12). This subsection specifies that all containers of hazardous waste (K061) be stored (less than 90 days) in an accumulation

(cont.)
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Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 9-8-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-8-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Merion City

Violations (cont.)

- 3) (cont.) area that has an impervious containment and collection system. This hopper of dust on the ground in a wooden shed does not meet these requirements. You should discontinue storing hazardous waste in this area.
- 4) The hopper of K61 dust was not marked with the accumulation date. This is a violation of Section 75.262 (g) (1) (iii).
- 5) Two manifests (M10888702) and (CUMA333249) lacked signed copies verifying delivery. This copy should be secured and retained for twenty (20) years on site as required by Section 75.262 (h).
- 6) No quarterly reports have been completed since December 1986 and you have not changed your hazardous waste activity status. You should submit quarterly reports (10) to accurately document the hazardous waste shipments during each quarter to the present, with a cover letter that clarifies the late delivery.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations. (cont.)

Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Date _____

9-8-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-8-89 Identification Number PAD004337903
Company, Installation Name Braeburn Alloy Steel
County Westmoreland Municipality Lower Burrell City

Violations (cont.)

- 7) At closure of the electric arc furnace (8-7-87) all hazardous waste dust was not removed. All remaining containers, waste in the baghouse and contaminated soil should be removed as required by Section 75.265 (g) (13).
- 8) A waste gasoline mix used to degrease oil filters is presently stored on site without the necessary markings and labels. You should identify the drum as a hazardous waste and provide "flammable-liquid" labels as required by Section 75.262 (g) (1) (ii).
- 9) Chlorinated solvents previously used to degrease oil filters were not properly identified. You should determine where this spent solvent is stored and properly mark and label in accordance with U.S.D.O.T. regs.

C) Comments:

1) Those violations specified in the June 24, 1988 inspection and July 14, 1988 Notice of Violation have not been satisfactorily corrected yet. (cont.)

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Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 9-8-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-8-89 Identification Number PAD 004 337903
 Company, Installation Name Braeburn Alloy Steel
 County Westmoreland Municipality Lower Russell Cts

Comments (cont.)

- 1) (cont.) You should correct these first, and then the remaining violations within 30 days of this inspection date.
- 2) Upon proper disposition of all wastes present on site, you should reevaluate your remaining hazardous waste streams to identify if you generate less than 1000 kg/mo.
- 3) The following non hazardous waste violations were identified and should also be resolved within 30 days:
 - a) As many as 50 drums of oil and oily waste were found throughout the plant in open top and overflowing drums. Soil around some of the containers was contaminated with oil. You should immediately stabilize and properly containerize all waste oils. The non liquid oily waste, sludges and soils should be properly disposed at a permitted landfill as a residual waste, if confirmed by analysis.
 - b) All other non-hazardous, residual wastes that are not clean fill should be properly

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Person Interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 9-8-89

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 9-8-89 Identification Number PAD 004337903
Company, Installation Name Brackman Alloy Steel
County Westmoreland Municipality Lower Merion City

Comments (cont.)

(b) (cont.) containerized and disposed at a permitted landfill with Departmental approval.

c) any off specification raw materials should be properly stored, pending final disposition or use.

4) Land disposal restrictions appear to be adequate to date, since no wastes have been shipped since the effective dates for the waste streams. Disposition of the remaining one yard of K061 dust should be completed in accordance with these requirements. Proper notification or certification should be attached to the manifest copies.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

Robert L. Famburn

Date

9-8-89

Inspector (signature)

Gerald S. Ingole

Date

9-8-89



(412) 925-8115

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

ENVIRONMENTAL PROTECTION
Bureau of Waste Management
Armbrust Professional Center
R. D. 2, Box 603-C
Greensburg, Pennsylvania 15601

July 14, 1988

CERTIFIED MAIL NO. P. 799 280 066

Braeburn Alloy Steel, Subsidiary of CCX, Inc.
Main Road
Lower Burrell, PA 15068

ATTENTION: Robert Lambermont

Re: RCRA Inspection
EPA ID No. PAD 004337903
Lower Burrell City
Westmoreland County

RCRA COMPLIANCE SECTION
RECEIVED
AUG 25 1988

NOTICE OF VIOLATION

Dear Mr. Lambermont:

A Resource Conservation and Recovery Act (RCRA) inspection of the subject facility was made on June 24, 1988. Pennsylvania Department of Environmental Resources is enforcing the requirements of this Act for the U.S.E.P.A. in Pennsylvania through an agreement with the EPA. Regulations which are equal to or more stringent than EPA's have been passed by Pennsylvania and are found in Act 97 "Pennsylvania Solid Waste Management Act," the Act of July 7, 1980, PL 380 No. 99, 35 P.S. §6018.101 et seq and Chapter 75 "Solid Waste Management Rules and Regulations" SECS 75.260-75.265. This letter is to notify you of the violations that were noted at the time of the inspection.

1. Bag house dust (K061) was stored on-site from June 23, 1987 to December 10, 1987. Additionally, from December 10, 1987 to June 24, 1988 approximately one cubic yard of bag house dust remained in the dust collection box. You should transport all hazardous waste within ninety (90) of the accumulation date. Any additional dust stored inside the bag house or spilled on the ground should also be cleaned up and properly disposed at this time. This is a violation of Section 75.262(g)(1)(i)(2).
2. The bag house dust (K061) should be stored in DOT approved containers. They should be properly identified and dated. Any drums or other containers should be properly sealed to prevent spillage or leakage. Hazardous waste storage containers should be inspected weekly to verify the condition of the containers in the storage area. This is a violation of Section 75.262(g)(1)(ii),(iv) and also Section 75.265(q)(3),(5).

July 14, 1988

3. Several manifests were not available during this inspection to verify delivery of the hazardous waste to the treatment storage or disposal facilities. If you cannot find the (TSD) signed copies of the following manifests, then you should file an exception with Harrisburg to document all steps taken to verify the proper receipt and disposal. Please document the disposition of the following manifests:

- (a) Manifest document numbers PAB2403774 and PAB0046513 to Mill Service Inc.
- (b) Manifest document number MI0888702 transported by Metropolitan Environmental to Michigan Disposal Inc.
- (c) Manifest document number CWMA333250 transported by Ecology Chemical to Chemical Waste Management.

You should submit photocopies of all misplaced manifests to this office. You should store all manifests, quarterly reports, and exception reports for a period of twenty (20) years from the date generated. These are violations of Section 75.262(h)(1),(2) and Section 75.262(j)(2).

4. As of June 24, 1988, five (5) hazardous waste quarterly reports were overdue. You should properly complete quarterly report (Form 55) and submit to Harrisburg for all of the previous five (5) quarters along with a cover letter that clarifies the late delivery. This is a violation of Section 75.262(i)(1)(ii).

A reinspection of the facility will be conducted on or about August 15, 1988, to determine if the above listed items have been corrected. Failure to comply could result in legal action being taken against you. Penalties for violations can be assessed from \$2,500 to \$100,000 per day.

Failure to abate this violation may result in legal action being initiated against you.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore to hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

Braeburn Alloy Steel
Subsidiary of CCX, Inc.

-3-

July 14, 1988

If you have any questions, contact me at the above number.

Sincerely,



Gerald Tripoli
Solid Waste Specialist

GT/jao

cc: Central Office
Chron
EPA ✓
Regional
Westmoreland County File



Official Business
Penalty for Private Use
\$300

United States
Environmental Protection
Agency

Washington DC 20460



FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

JOHN A ARMSTEAD
VA/WV SECTION (3HW31)
US EPA REGION III
841 CHESTNUT ST.
PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

E5

42

Hazardous Waste Quantity Notification

Business Name BRAEBURN ALLOY STEEL

Business Address LOWER BURRELL, PA. 15068

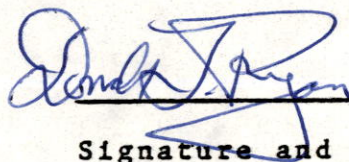
EPA ID Number PAD004337903

Hazardous Waste Generated

0 - 100 kg/month ☐

100 - 1000 kg/month ☐

1000 kg/month or more ☒



Vice Pres.-Operations

Signature and Title

Hazardous Waste Inspection Report
Generators - Part AGEN
BRAEBURN Alloy
STEEL

Date of inspection 6-24-88 Time start 2:30 Time finish 4:45
 Name of inspector Gerald Anzoni
 Company, installation name Braeburn Alloy Steel, subs. of CCX, Inc.
 Location Main Road Lower Burrell
 County Westmoreland Municipality Lower Burrell City
 Identification number PANDOC 4337903
 Name of responsible official Robert Lambermont
 Title _____
 Mailing address Main Road. Lower Burrell, Pa 15068
 Area code and telephone number (412) 224-6900
 Name of person interviewed Bob Lambermont
 Title Mgr. of Eng. & Maint.
 Mailing address (if different from above) SAME
 Area code and telephone number _____

1. Current waste handling method:

- | | | | | | |
|----|--|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. | <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. | <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. | <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 3000 kg./mo.
 b. _____ kg./yr.

acid etch closed
EAF (dust) closed.

3. Types of hazardous waste produced by Hazardous Waste Number:

K061, D002, D007

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

Will Service
Ecology Chemical
Metropolitan Env. Inc.

RCRA COMPLIANCE SECTION
 RECEIVED
 AUG 30 1988

Hazardous Waste Inspection Report
Generators — Part B

6-24-88

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
✓				Hazardous waste determination, copies available		(b)
✓				Identification number		(c)(1)
✓				Hazardous waste shipments offered only to licensed transporters		(c)(4)
✓				Authorization received from TSD facility for wastes shipped off-site		(d)
✓				PA manifest used for intrastate shipments		(e)(2)
✓				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
✓				Manifests filled out properly and completely		(e)(7)
			✓	Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
✓				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
✓				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
✓	✓			Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
✓				Placards offered to transporter		(f)(2)
			✓	Wastes accumulated on-site for less than 90 days		(g)(1)(i)
			✓	Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
	✓			Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
			✓	Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
			✓	Records retained at designated location for 20 years		(h)
			✓	Quarterly reports submitted to the Department		(i)
			✓	Exception reporting procedures followed		(j)
	✓			Hazardous waste disposal plan, if required		(l)
	✓			Spill reporting procedures followed		(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	✓			Special requirements followed for international shipments		(o)
✓				On the job or classroom personnel training program [75.265(f)]		(g)(1)(6)
	✓		✓	Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)

Hazardous Waste Inspection Report
TSD Facilities — Storage (Containers and Tanks)

Buckhorn Alley

6-24-88

1-Non-Compliance, 2-Compliance, 3-Not Applicable, 4-Not Determined

Compliance Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.265
			<input checked="" type="checkbox"/>	Containers managed to prevent leaks and spills.	(q)(1), (4)
			<input checked="" type="checkbox"/>	Containers are compatible with waste stored.	(q)(2)
			<input checked="" type="checkbox"/>	Containers are closed during storage.	(q)(3)
			<input checked="" type="checkbox"/>	Container storage area inspected weekly for leaks, deterioration, etc.	(q)(5)
			<input checked="" type="checkbox"/>	Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q)(6)
			<input checked="" type="checkbox"/>	Satisfactory procedures followed for handling incompatible wastes.	(q)(7), (8)
			<input checked="" type="checkbox"/>	Incompatible wastes separated or protected from other materials.	(q)(9)
			<input checked="" type="checkbox"/>	Containers and tanks labeled to identify accurately hazardous waste contained.	Act 97 Section 403(b)(2)
			<input checked="" type="checkbox"/>	Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material.	(r)(2)
			<input checked="" type="checkbox"/>	Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r)(3)
			<input checked="" type="checkbox"/>	Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r)(4)
			<input checked="" type="checkbox"/>	Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r)(4)
			<input checked="" type="checkbox"/>	Continuously fed tanks equipped with a means to stop the inflow.	(r)(5)
			<input checked="" type="checkbox"/>	Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r)(6)
			<input checked="" type="checkbox"/>	Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(r)(7)
			<input checked="" type="checkbox"/>	Discharge control equipment inspected once each operating day.	(r)(8)(i)
			<input checked="" type="checkbox"/>	Monitoring equipment data inspected once each operating day.	(r)(8)(ii)
			<input checked="" type="checkbox"/>	Liquid level of tanks inspected once each operating day.	(r)(8)(iii)
			<input checked="" type="checkbox"/>	Construction materials of tanks inspected weekly.	(r)(8)(iv)
			<input checked="" type="checkbox"/>	Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r)(8)(v)
			<input checked="" type="checkbox"/>	All hazardous waste removed from tanks and related appurtenances at closure.	(r)(9)
			<input checked="" type="checkbox"/>	Placement of ignitable or reactive waste only with the Department's approval.	(r)(10)
			<input checked="" type="checkbox"/>	Covered tanks in which ignitable or reactive waste is treated or stored meets NEPA buffer zone requirements.	(r)(11)
			<input checked="" type="checkbox"/>	Precautions taken for handling ignitable, reactive or incompatible waste or materials.	(r)(12), (13)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 6-24-88 Identification Number PAD004337903
Company, Installation Name Brachman Alloy Steel
County Westmoreland Municipality Lower Merion

A) Observations

- 1) Weather was hot and sunny.
- 2) Record and facility inspection was conducted with Bob Lambermont who replaced Don Ryan.
- 3) Records were not very organized - several manifest copies were missing.
- 4) The acid etch dept and the electric arch furnace were both shut down in July 1987.
- 5) The present operation consists of forge and rolling mills and annealing.
- 6) Overall the plant is being cleaned, leveled and painted.
- 7) The hopper for the flue dust was full. This and the baghouse need cleaned.
- 8) Several large oil and one water storage tanks are to be removed.
- 9) Oil soaked dirt or asphalt should be cleaned up to prevent surface water discharges.

(cont.)

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) Robert Lambermont Date 6-24-88
Inspector (signature) Paul J. Dwyer Date 6-24-88

Braeburn Alloy Steel

6-24-88

B) Violations:

- (2)(14) or (15) 1) Several manifests were not available and (j) to verify delivery to the TSD facility. If you can not find the ^(TSD) signed copy of the following manifests, then you should file an exception report to Harrisburg (and send me a copy). If you do find them here, then you should send a xerox copy and a letter to me for each manifest
- a) Mill Service: PAB 2403774 & PAB 0046513
 - b) Metropolitan Environmental → Michigan Disposal, Inc: MI-O 88 8702
 - ~~c) Mill Service: PAB 0046516 found.~~
 - c) Ecology Chemical → Chem Waste Mgt: CWM A 333250
- 2) Baghouse dust (K061) was stored on site from 6-23-87 to 12-10-87 - also from 12-10-87 to the present date approximately 1 yd³ of dust remains in the open hopper box. (under cover) you should ship all hazardous waste within 90 days of being generated. Any additional dust stored inside the baghouse or spilled on the ground should also be cleaned up and properly disposed.
- 3) The baghouse dust should be stored in a DOT approved container (drums) They should be properly identified, labeled and marked with the accumulation date. These drums should be sealed to prevent water or spills

Robert G. Funder 6/24/88

(cont)

Braeburn Alloy Steel

6-24-88

- (h) 4) Several manifests and quarterly reports were not available. All manifests and quarterly reports should be stored for 20 years.
- (i) 5) As of July 1, 1988 - six hazardous waste quarterly reports will be due. You should properly complete each quarterly report and send to Harrisburg along with a letter that clarifies the late delivery. You should keep a copy for your records.
- (g) 6) The dust box (rolloff) was not inspected for a year. The present hopper box of dust (K061) has not been inspected weekly either due to a change in mgt. You should begin to check the condition of the box or drums used to store hazardous waste until they are shipped for disposal.

Note: This facility does not presently generate any hazardous waste other than that which is presently on site in containers and equipment. As soon as you remove all hazardous waste, you may wish to renotify to drop your hazardous waste generator status.

Robert E. Frankfort 6/24/88

6-24-88 Gerald Dwyer.

BRAEBURN

ALLOY STEEL

Lower Burrell, PA 15068 412/224-6900

August 2, 1984

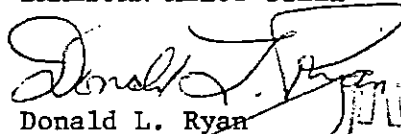
Pa. Dept. of Environmental Resources
Bureau of Solid Waste Management
P. O. Box 2063
Harrisburg, PA 17120

Gentlemen:

Enclosed please find an updated Notification of Hazardous
Waste Activity.

Sincerely yours,

~~BRAEBURN-ALLOY-STEEL~~


Donald L. Ryan
Vice President-Operations

AUG 9 1984

PA. DEPT. OF HAZARDOUS WASTE

DLR/rlk

Enclosure

*Filed
0002-0007
3-21-85
Ch. for contact*

BRAEBURN

Division of CCX, Inc.

BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53: Rev. 3/82

I INSTALLATION'S EPA I.D. NUMBER																	
P	A	D	0	0	4	3	3	7	9	0	3						
II NAME OF INSTALLATION																	
Braeburn Alloy Steel Co.																	
III INSTALLATION MAILING ADDRESS																	
STREET OR P. O. BOX																	
CITY OR TOWN										ST.	ZIP CODE						
Lower Burrell										PA	15068						
IV LOCATION OF INSTALLATION																	
STREET OR ROUTE NUMBER										MUNICIPALITY							
CITY OR TOWN										ST.	ZIP CODE						
Lower Burrell										PA	15068						
COUNTY										Westmoreland							
V INSTALLATION CONTACT																	
NAME AND TITLE (last, first, & job title)										PHONE NO. (area code & no.)							
Ryan, Donald Vice President-Operations										412-224-6900							
VI OWNERSHIP																	
A. NAME OF INSTALLATION'S LEGAL OWNER																	
CCX, Inc.																	
B. TYPE OF OWNERSHIP																	
(enter the appropriate letter into box)																	
F = FEDERAL M = NON-FEDERAL M																	
VII SIC CODES (4-digit in order of priority)																	
A. FIRST						C. THIRD											
3	3	1	2	(specify) Rolling Mills - Tool Steel							(specify)						
B. SECOND						D. FOURTH											
0	4	9	3	(specify) Electric Arc Furnaces							(specify)						
VIII TYPE OF HAZARDOUS WASTE ACTIVITY																	
<input checked="" type="checkbox"/> A. GENERATION			<input type="checkbox"/> C. STORE			<input type="checkbox"/> E. TRANSPORTATION (COMPLETE ITEM IX)			<input type="checkbox"/> G. REUSE, RECYCLE, RECLAIM								
<input type="checkbox"/> B. TREAT			<input type="checkbox"/> D. DISPOSE			<input type="checkbox"/> F. PERMIT BY RULE			<input type="checkbox"/> H. OTHER (specify):								
IX MODE OF TRANSPORTATION (transporters only)																	
<input type="checkbox"/> A. AIR			<input type="checkbox"/> B. RAIL			<input type="checkbox"/> C. HIGHWAY			<input type="checkbox"/> D. WATER			<input type="checkbox"/> E. OTHER (specify):					
X EXISTING ENVIRONMENTAL PROGRAM PERMITS																	
A. NPDES (Discharges to Surface Water)						D. PSD (Air Emissions from Proposed Sources)											
P	A	0	0	0	1	4	0	6	6	5	3	0	7	0	0	4	
B. UIC (Underground Injection of Fluids)						E. SOLID WASTE						<div style="border: 1px solid black; padding: 5px; text-align: center;"> AUG 9 1994 </div>					
C. RCRA (Hazardous Wastes)						F. OTHER											
						465S70						Sanitary Discharge					
XI. TYPE OF NOTIFICATION,																	
Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).																	
<input type="checkbox"/> A. FIRST NOTIFICATION				<input type="checkbox"/> C. DELETION OF A WASTE				<input type="checkbox"/> E. DELETION OF AN ACTIVITY									
<input type="checkbox"/> B. CHANGE OF GENERAL INFORMATION				<input checked="" type="checkbox"/> D. ADDITION OF A WASTE				<input type="checkbox"/> F. ADDITION OF AN ACTIVITY									

CONTINUE ON REVERSE

XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K 0 6 1					
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
D 0 0 2	D 0 0 7				
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☐ 1. IGNITABLE

☐ 2. CORROSIVE

☐ 3. REACTIVE

☐ 4. EP TOXIC

XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME and OFFICIAL TITLE (Type or Print)

DATE SIGNED

Donald Ryan Vice President-Operations 8/2/84

FOR OFFICIAL USE ONLY

AUG 9 1984
DIV. OF HAZARDOUS WASTE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.
Philadelphia, Pa. 19106

SUBJECT: RCRA Inspection: **BRAEBURN ALLOY STEEL**
PAD 00 433 7903

DATE: **12/16/83**

FROM: James N. Webb
Environmental Engineer (3AW22)

TO: File

THRU: **For** Peter Schaul **General 12/19**
Chief, Waste Enforcement Section (3AW22)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF
THESE VIOLATIONS.

RECORD OF COMMUNICATION		<div>RETURN</div> <input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
		(Record of item checked above)	
TO:	<i>McB</i>	FROM:	<i>Gerry Tripoli - SWS.</i> <i>DLR (PITTSBURGH)</i>
		DATE	<i>12/16/83</i>
		TIME	<i>1:00 PM</i>
SUBJECT			
<i>Braeburn Alloy Steel (PAD 00 433 7903)</i>			
SUMMARY OF COMMUNICATION			
<p><i>Gerry instructed Braeburn to begin removal of the spilled material. Since the facility was not reinspected, Mr. Tripoli is unsure as to how far removal has progressed. He stated that he will follow-up on this situation. Gerry also noted that this facility is a marginal operation at low production and is therefore generating very little waste.</i></p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES			
TO:			

HAZARDOUS WASTE INSPECTION REPORT
Generators - Part A

11-7-83

Date of inspection 10-4-83 Time start 11:00 Time finish 3:00
Name of inspector Gerald Tangoli
Company, installation name Brachum Alloy Steel
Location Main Rd. Lower Burrell, Pa
County Westmoreland Municipality Lower Burrell
Identification number PAD004337903
Name of responsible official Donald Ryan
Title Vice President of Operations
Mailing address Main Rd. Lower Burrell
Area code and phone no. 412-224-6900
Name of person interviewed Donald Ryan
Title V.P. Operations
Mailing address (if different from above) SAME
Area code and phone no. _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

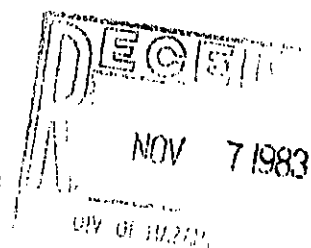
- a. 4,000 lbs kg./mo.
b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

K061, K062, P002

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

Mill Service
Ecology Chem.



HAZARDOUS WASTE INSPECTION REPORT
Generators - Part B

FACILITY NAME Greenman

ID #

Date 10-4-83

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION 75.26
1	2	3	4		
	✓			Identification number	(c) (1)
				Hazardous waste shipments offered only to licensed transporters	(c) (4)
	✓			Authorization received from TSD facility for wastes shipped off-site	(d)
	✓			PA manifest used for intrastate shipments	(e) (1)
			✓	Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1)
✓				Manifests filled out properly and completely	(e) (3)
	✓			Manifests routed properly and within time limits (24 hours)	(e) (2)
	✓			Proper U.S. DOT shipping containers or packages	(f) (1)
	✓			Shipping containers marked and labeled according to U.S. DOT	(f) (1)
✓				Containers of 100 gal. or less marked with required PA label	(f) (1)
	✓			Placards offered to transporter <i>Transporter provides</i>	(f) (1)
✓				Wastes accumulated on-site for less than 90 days	(g) (1)
	✓			Wastes stored in proper containers and properly marked and labeled	(g) (1)
✓				Containers managed in accordance with 75.265(q) <i>1-9</i>	(g) (1)
	✓			Containers clearly marked with accumulation date and visible for inspection	(g) (1)
	✓			Records retained at designated location for 20 years	(h)
✓				Quarterly reports submitted to the Department	(i)
		✓		Exception reporting procedures followed	(j)
		✓		Hazardous waste disposal plan, if required	(l)
		✓		Spill reporting procedures followed	(m)
✓				Preparedness, Prevention and Contingency Plan approved and implemented	(m)
		✓		Special requirements followed for international shipments	(o)

NOV 7 1983

11A

DIV. OF HAZARDOUS

Date of inspection 10-4-83 Identification number PA 0004-337903
 Company, Installation name Braiburn Alloy Steel Co.
 County Westmoreland Municipality Lower Burrell City

Violations

- ① Three manifests dated 2-15-83, 5-25-83 & 9-22-83 all identify the waste acid bath as D002. The analysis that you had completed identifies 1500 ppm total chrome. An EP toxic test for chrome should have been completed to verify this waste as D007 - C, T or this waste should have been identified as K062, ^{waste} pickle liquor, thus requiring no analysis. Properly identify this waste on all manifest and quarterly reports. SS 75.262 (e)
- ② A few shipments of K061, dust, have exceeded the 90 day limit for generators. Ship rolloff box within 90 days of initial fill date. SS 75.262 (g). Note: Henry will submit completion by 10/10/83
- ③ The first and second quarterly reports for 1983 lack the waste acid shipments that were made during these quarters. Submit a revised quarterly report for each quarter and a cover letter identifying the error to Hbg, ~~the~~ and a copy to me. SS 75.262, (i)
- ④ The PPC plan as completed in March, 1982 does not address all recommended elements nor the required elements of SS 75.26. Revise the PPC plan and implement. SS 75.262 (m)

NOV 7 1983

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person interviewed (signature) [Signature]

Date Oct 4/1983

Inspector (signature) Gerald [Signature]

Date 10-4-83

Date of inspection 10-4-83 Identification number PA000433720
Company, Installation name Braiburn Alloy Steel Co.
County Westmoreland Municipality Lower Burrell City

Violations

- ⑤ Some solvents are used in the machine shop and may be added to the oily wastes. Test oil for ignitability, characteristic flashpoint of 140°F or below. § 75.262 (b)
- ⑥ EPA warning label is used. Replace it with the Pa warning label or provide additional information as required. § 75.262 (f)
- ⑦ Drums of waste acid was open. Keep all drums of waste acid sealed when not being filled. § 75.265 (g)
The oily earth areas have not been cleaned up yet. Proceed to gain DER approval and implement cleanup plan as soon as possible

NOV 7 1983

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming confirming any violations indicated herein and listing any additional violations.

Person interviewed (signature) [Signature] Date Oct 4, 1983
Inspector (signature) Gerald D. [Signature] Date 10-4-83



House

Braeburn, Lower Burrell, Pennsylvania 15068 - (412) 224-6900

November 7, 1980

E.P.A. _ Region III
P.O. Box 1460
Philadelphia, Pa. 19107

Attention: Ms. Shirley Bulkin

RE: EPA I.D. No. PAD 004337903

Dear Ms. Bulkin:

On August 13, 1980, Braeburn Alloy Steel submitted EPA FORM 8700-12 ("Notification of Hazardous Waste Activity") to comply with RCRA regulations. Item VI A. Generation should have been checked.

Please make the above correction on your records. This action and letter will confirm my phone call to you this date.

Very truly yours,
BRAEBURN ALLOY STEEL DIVISION

C. C. Nelson

C. C. NELSON
Plant Engineer

CCN/djv

cc: H. Becker
D. Ryan

CCS BRAEBURN ALLOY STEEL

Braeburn, Lower Burrell, Pennsylvania 15068 - (412) 224-6900

April 27, 1981

United States Environmental Protection Agency
Region III
6th & Walnut Streets
Philadelphia, PA 19106

Attention: Ms. Shirley D. Bulkin - Chief, RCRA Administrative Support Section

RE: BRAEBURN ALLOY STEEL - EPA I.D. No. PAD 00433-7903
REF: Your letter dated 4/14/81 (Received 4/20/81)

Dear Ms. Bulkin:

Since November 19, 1981, we have contracted to have all of Braeburn's Electric Furnace Dust hauled away by a licensed hauler (Mill Service Inc. - E.P.A. I.D. No. PAD 00483-5146). The slag generated at the Electric Furnaces and disposed on the plant site has been tested (EP Toxicity Analysis) and results show that the slag is not a hazardous waste. Therefore it will not be necessary for Braeburn to file a Part A Permit application.

Very truly yours,
BRAEBURN ALLOY STEEL DIVISION



C. C. Nelson
Plant Engineer

CCN/djv

cc: H. Becker
D. Ryan
J. Sack

*delete
TSD
5/11/81*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

April 14, 1981

Cecil Nelson
Braeburn Alloy Steel
Main Road
Lower Burrell, Penna 15068

Re: Facility Name: Braeburn Alloy Steel
EPA I. D. Number: PAD 00 433 7903

Dear Mr. Nelson:

Region III of the Environmental Protection Agency (EPA) is currently reviewing the accuracy and completeness of information submitted under the Resource Conservation and Recovery Act (The Act) concerning hazardous waste management activity. EPA has received a Notification of Hazardous Waste Activity (EPA Form 8700-12) for the above facility which indicates that this facility treats, stores or disposes of hazardous waste.

To continue operating after November 19, 1980, all facilities which treat, store or dispose of hazardous waste must have submitted a Part A permit application (EPA Form 3510-1, 3) to EPA by that date. As of this date, EPA has not received a Part A permit application for this facility. If you have determined that this facility does not treat, store or dispose of hazardous waste, please send a letter to that effect within ten days of receipt of this letter. This request is being made pursuant to Section 3007 of the Act, 42 U.S.C. § 6927.

If you have any questions, please contact Joan Henry at the above address or call 215/597-8751.

Sincerely yours,

Shirley D. Bulkin
Chief, RCRA Administrative Support Section
Permit Enforcement Branch
Enforcement Division

BRAEBURN ALLOY STEEL



ENVIR
HAZARDOUS WA
FACILITY

CARD CODE	FACILITY IDENTIFICATION NUMBER	TRANS CODE	CARD NO.	NOTIFICATION APPROVAL	DATE NOTIFIED	PERMIT APPLICATION APPROVAL	DATE PART A PERMIT REC'D	FACI			
F	8.A.0.0.4.3.3.7.9.0.3.3.1										
1	2	13	14	15	16	17	22	23	24	29	30
FACILITY CONTACT NAME/POSITION											
F	DUP		2								
1	2	13	14	15	16						
MAILING ADDRESS											
F	DUP		3								
1	2	13	14	15	16						
MAILING CITY											
F	DUP		4								
1	2	13	14	15	16						
FACILITY ADDRESS											
F	DUP		5								
1	2	13	14	15	16						
FACILITY CITY											
F	DUP		6								
1	2	13	14	15	16						
NEW SIC OLD SIC											
F	DUP		7								
1	2	13	14	15	16	19	20	23			
FACILITY OWNER'S NAME											
F	DUP		3	8							
1	2	13	14	15	16						
ACTIVITY CODE TRANSPORT MODE											
OWNER TYPE	GEN	TRANS	TSD	UIC	AIR	RAIL	ROAD	WATER	OTHER	FAC. STAT.	PERM. STAT.
56	57										
CLOSURE DATE											
TYPE NEW PERMIT NUMBER											
F	DUP		9								
1	2	13	14	15	16	17	18	30	31	32	33
TYPE OLD PERMIT NUMBER											
F	DUP		9								
1	2	13	14	15	16	17	18	30	31	32	33
TYPE OLD PERMIT NUMBER											

(5-80)

I.D. - FOR OFFICIAL USE ONLY									
S	W	P	A	00	09	43	37	90	3
1	2	3	4	5	6	7	8	9	10
11	12	13	14	15	16	17	18	19	20

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K 0 6 1					
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

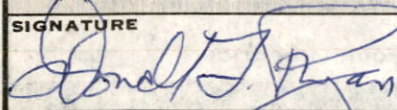
☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Donald L. Ryan Vice President - Operations	DATE SIGNED 8/13/80
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EPA Form 8700-12 (6-80) REVERSE

RE: Federal Register 261.32 (Amended) NOT APPLICABLE



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•PAD004337903

BRAEBURN ALLOY STEEL
MAIN RD
LOWER BURRELL

PA 15068

INSTALLATION ADDRESS

MAIN ROAD BRAEBURN
LOWER BURRELL

PA 15068